

MEMO ENDORSED

DOAR RIECK KALEY & MACK
ATTORNEYS AT LAW

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC#:
DATE FILED: 7/23/21

JOHN DOAR (1921-2014)
WALTER MACK

OF COUNSEL
JOHN JACOB RIECK, JR.
JOHN F. KALEY
DAVID RIVERA
MICHAEL MINNEFOR

ASTOR BUILDING
7TH FLOOR
217 BROADWAY
NEW YORK, N.Y. 10007-2911

TELEPHONE: (212) 619-3730
FACSIMILE: (212) 962-5037
e-mail: firm@doarlaw.com
website: www.doarlaw.com

July 22, 2021

Via ECF Filing

The Hon. Andrew L. Carter Jr.
United States District Judge
Southern District of New York
United States Courthouse
40 Foley Square
New York, New York 10607

Re: *United States v. James Wilson*
Docket No. 18 Cr. 420 (ALC)

Dear Judge Carter:

I represent the defendant James Wilson in the above-referenced matter. Pursuant to the Court's oral order on April 2, 2020 in the above-referenced matter, I write now without objection from the Government to provide the Court with an update regarding the defendant's upcoming sentencing and to request a new sentencing date. The defendant currently is scheduled to be sentenced on August 8, 2021. The parties, however, propose that the defendant's sentencing be adjourned for approximately 30 days to early September on a date convenient for the Court as Mr. Wilson and counsel would prefer an in-person sentencing proceeding. Because of the current pandemic and recent uptick in the number of new cases and the new variant, I have concern about meeting in-person with Mr. Wilson and would appreciate additional time to prepare adequately for sentencing. AUSA Clore has no objection to the adjournment requested.

The parties agree that an adjournment in this case is warranted because further delay will not result in serious harm to the interests of justice as the defendant is currently released on bail.

In that regard, during the status conference held on April 2, 2020, the Court ordered Mr. Wilson's temporary release for 60 days and has continued Mr. Wilson's release on bail by

Honorable Andrew L. Carter Jr.

2

July 22, 2021

Orders dated May 18, 2020 (ECF # 554), August 5, 2020 (ECF # 610), October 14, 2020 (ECF # 629), January 6, 2021 (ECF # 652), March 25, 2021 (ECF # 686) and May 21, 2021 (ECF # 707). In light of the parties' request for an adjournment, the parties further request that the defendant's bail continue until the new sentencing date.

Thank you for Your Honor's consideration of this request.

Respectfully submitted,

/s/
John. F. Kaley, Esq.

cc: AUSA Christopher Clore
(via ECF and email)

The entire application is **GRANTED**.
Sentencing adjourned to 9/9/21 at
2:00 p.m.
So Ordered.

 7/23/21